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Attorneys for Plaintiff Millrock Investment Fund 1, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

MILLROCK INVESTMENT FUND 1, LLC,

Plaintiff,

v.

HEALTHCARE SOLUTIONS
MANAGEMENT GROUP, INC.;
HEALTHCARE SOLUTIONS HOLDINGS
INC.; LANDES CAPITAL MANAGEMENT,
LLC; LANDES AND COMPAGNIE TRUST
PRIVE KB; JOSHUA CONSTANTIN;
JUSTIN SMITH; STUART MCMAHEN; and
BLACK LABEL SERVICES, INC.,

Defendants.

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO FILE OPPOSITION TO
CONSTANTIN AND MCMAHEN'S
MOTION FOR SUMMARY JUDGMENT**

Case No. 2:23-CV-00157-RJS-DAO

Chief District Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

Plaintiff Millrock Investment Fund 1, LLC, ("Millrock"), by and through its counsel of record in this matter, hereby moves the Court to extend the deadline in this case for Millrock to file an opposition to Joshua Constantin and Stuart McMahan's Motion for Summary Judgment

(ECF No. 95) (the “Summary Judgment Motion”) from July 31, 2024 through and including August 8, 2024.

Good cause exists for the requested extension because counsel for Millrock has been out of the country, and because Millrock needs the requested additional time to respond to the Summary Judgment Motion. Counsel for Millrock will not seek another extension past August 8, 2024. Counsel for Millrock has consulted with counsel for Joshua Constantin and Justin Smith, and counsel for Joshua Constantin and Justin Smith does not oppose this Motion.

This Motion is timely because the current July 31, 2024 deadline to respond to the Summary Judgment Motion has not expired.

A copy of the proposed Order Extending Deadline to File Opposition to Constantin and McMahan’s Motion for Summary Judgment is attached as Exhibit “A.”

DATED this 30th day of July, 2024.

PARR BROWN GEE & LOVELESS

By: /s/ *Bentley J. Tolk*
Terry E. Welch
Bentley J. Tolk
Rodger M. Burge

Attorneys for Plaintiff Millrock Investment Fund 1, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2024, I caused to be served a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE OPPOSITION TO CONSTANTIN AND MCMAHEN'S MOTION FOR SUMMARY JUDGMENT** via the CM/ECF system on the following:

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/s/ Bentley J. Tolk